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March 31, 2015

Federal Election Commission  
Office of Complaints Examination and Legal Administration  
Attention: Frankie Hampton, Paralegal  
999 E. Street, NW  
Washington, D.C. 20436  
VIA FEDERAL EXPRESS

Re: Complaint No. MUR 6914

Dear Commission:

This office, through the undersigned, is responding to the above-noted Complaint. Enclosed is a completed "Statement Of Designation Of Counsel" for your records.

As we understand the Complaint, it alleges solely that there was a failure of the DeFranco For Congress Committee to report in the Committee's October 15, 2014, FEC Report an unspecified debt alleged by the Complainant to be owed to the Complainant. No debt was listed for the simple reason that no debt was owed.

Conspicuous by its absence in the Complaint is any mention of the alleged amount owed. We submit that there are several reasons for that absence, aside from the fundamental fact that no debt is owed.

First, the Complainant was paid \$1,000, at an agreed rate of \$500 per month, for a two month period, commencing on or about March 10, 2014, through April 2014, and up to on or about May 10, 2014. That \$1,000 payment was reported on the FEC Report for the second quarter (for the period April 1, 2014, through June 30, 2014) dated July 15, 2014. See that quarterly report, Schedule B thereof (Itemized Disbursements), page 23.

Second, the Complainant, on June 24, 2014, released the DeFranco For Congress Committee from the agreement with the DeFranco For Congress Committee.

While there were further communications between the Complainant and the DeFranco For Congress Committee, those communications were predicated on the express understanding that the DeFranco

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For Congress Committee required local media support, which the Complainant, being based in Maryland, could not provide.

The Complainant belatedly (by e-mail on September 30, 2014) provided an alleged claim. The matter was placed in the hands of legal counsel, who dealt with the Complainant. The Complainant was not heard from again until many months later when the notice was received from the Commission regarding the subject allegation of failure to report a purported debt on the subject FEC Report.

Given the release of the DeFranco For Congress Committee in June 2014, as noted above, and for reasons related to subsequent behavior by the Complainant, which we will not set forth at this time, the position of the DeFranco For Congress Committee was unchanged, i.e., there was and is no debt owed to the Complainant.

The DeFranco For Congress Committee submits that the subject FEC Report was substantively accurate when prepared and submitted and remains accurate to this date.

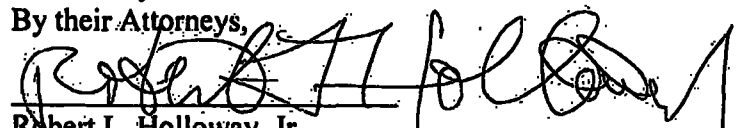
The Complainant has not pursued any civil action against the DeFranco For Congress Committee. Instead, the Complainant belatedly has asserted this complaint with the Commission, alleging that a supposed debt was not listed in the subject FEC Report. For the reasons set forth herein, there was no debt and thus no debt to report.

In sum, there is no merit to this Complaint, as there was and is no debt owed to the Complainant. The Complainant has failed even to state what Complainant claims to be owed and thus what Complainant alleges should have been listed on the subject FEC Report. Again, we submit that the reason for that failure by the Complainant is that the Complainant released the DeFranco For Congress Committee in June 2014.

We request that this Complaint be dismissed. If you have further questions, please contact the undersigned. Thank you.

Respectfully submitted,

DeFranco For Congress Committee  
Kai P. Moy, Treasurer  
By their Attorneys,

  
Robert L. Holloway, Jr.  
MacLean Holloway Doherty Ardiffe & Morse, P.C.

Enclosure (Statement Of Designation Of Counsel)  
Copy to: DeFranco For Congress Committee

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FEDERAL ELECTION COMMISSION  
999 E Street, NW  
Washington, DC 20463

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OFFICE  
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STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

FAX 202-219-3923

MUR # 6914

Name of Counsel: ROBERT L. HOLLOWAY, ESQ.

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The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

2/20/2015 Kai P. Moy TREASURER  
Date Signature (Respondent/Agent) Title

RESPONDENT: DEFRANCO FOR CONGRESS / KAI MOY  
(Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: PO BOX 103  
(Please Print) MIDDLETON, MA 01949

Telephone (H): \_\_\_\_\_ (W): 978-531-0405

E-mail: TEAM@MALISADEFRANCO.COM

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.